

ORIGINAL

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ASHLEY ADAMS
716 N Barrett Lane
Christiana, DE 19702
Mailing address:
PO Box 7652
Newark, DE 19714

DISTRICT COURT

PLAINTIFF

No. 04-251 JJF

v

JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921

JURY TRIAL

DEFENDANT

NOTICE OF MOTION

**MOTION FOR ORDER FOR PROCEDURES FOR FILING SUMMARY
JUDGMENT MOTIONS**

COMES NOW, Plaintiff Ashley Adams, requesting MOTION FOR ORDER FOR PROCEDURES FOR FILING SUMMARY JUDGMENT MOTIONS, setting forth the reasons as follows, to be heard at the Court's convenience.

Ashley Adams

Ashley Adams
July 16, 2007

2007 JUL 16 AM 11:44
LGS:am

U.S. DISTRICT COURT
CLERK'S OFFICE
FILED
DISTRICT OF DELAWARE

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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Christiana, DE 19702
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Newark, DE 19714

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DISTRICT COURT

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JURY TRIAL

MOTION

**MOTION FOR ORDER FOR PROCEDURES FOR FILING SUMMARY
JUDGMENT MOTIONS**

Plaintiff, Ashley Adams, pro se, hereby moves this
Honorable Court for ORDER FOR PROCEDURES FOR FILING SUMMARY
JUDGMENT MOTIONS AND RESPONSES and, in support thereof,
states the following:

(1)

Scheduling Order dated December 07, 2006, states:

1. Discovery. (e) Reports from retained experts required by Fed. R. civ. P. 26(a) are due from the party which has the burden of proof by April 30, 2007; Rebuttal report are due by May 31, 2007.

2. Discovery Disputes. (a) A party seeking discovery which the opposing party refuses to provide shall file a motion (no brief) pursuant to Rule 37 of the Federal Rules of Civil Procedure and Local Rule 37.1.
3. Case Dispositive Motions. Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before July 2, 2007. **The court will issue a separate Order regarding procedures for filing summary judgment motions.**

(2)

Plaintiff is not aware of any such Order in existence and the Order is not docketed in the Docket Sheet. Plaintiff requires the procedures in order to respond appropriately.

(3)

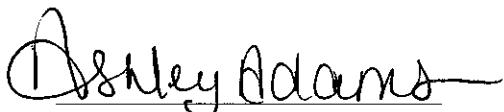
Defendant's Summary Judgment is based on a 'Discovery Dispute' item (2) above. Defendant, if filed a motion for Discovery (dispute), the items/issue would have been resolved prior to the necessity of filing a Motion for Summary Judgment.

(4)

Plaintiff, Ashley Adams, has provided to Defense Attorney, Beth Christman, numerous documents with evidentiary findings supporting Plaintiff, Ashley Adams' suit, and was not informed of any missing documents. Plaintiff, Ashley Adams would be delighted to submit the necessary and requested documents that supports evidence of her 'broken neck' resulting from the negligence of Jo Ellen Sheldon Chapen on April 23, 2002, but Plaintiff, Ashley Adams was informed all documents were in possession of Defendant's Attorney, Beth Christman,

and Defense Attorney, Beth Christman, did not state otherwise to notify Plaintiff, Ashley Adams of missing or needed documents, yet files a Motion for Summary Judgment.

WHEREFORE, Plaintiff, Ashley Adams asks this Honorable Court for the 'Court Ordered Procedures' as outlined in the scheduling document to be Ordered, hence, denying Defendant's Motion for Summary Judgment as it now stands filed and instruct Defendant to Motion for Discovery dispute if necessary to obtain information from Plaintiff, Ashley Adams.

A handwritten signature in black ink that reads "Ashley Adams". The signature is written in a cursive style with a horizontal line underneath it.

Ashley Adams, *Pro Se*, Plaintiff
PO Box 7652
Newark, DE 19714

302-393-3525

Dated July 16, 2007

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ASHLEY ADAMS
716 N Barrett Lane
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DISTRICT COURT

PLAINTIFF

No. 04-251 JJF

JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921

JURY TRIAL

DEFENDANT

ORDER

IT IS HEREBY ORDERED this _____ day of _____ 2007 that Plaintiff Ashley Adams' MOTION FOR ORDER FOR PROCEDURES FOR FILING SUMMARY JUDGMENT MOTIONS is **GRANTED**.

United States District Judge

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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Newark, DE 19714

DISTRICT COURT

PLAINTIFF

No. 04-251 JJF

v

JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921

JURY TRIAL

DEFENDANT

REQUEST FOR A HEARING

Plaintiff, Ashley Adams, hereby requests a Hearing on its Motion for ORDER FOR PROCEDURES FOR FILING SUMMARY JUDGMENT MOTIONS.

By: Ashley Adams

Ashley Adams
PO Box 7652
Newark, DE 19714
302-393-3525
Plaintiff, pro se

FILING DATE: July 16, 2007

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ASHLEY ADAMS	:	
716 N Barrett Lane	:	
Christiana, DE 19702	:	
Mailing address:	:	
PO Box 7652	:	
Newark, DE 19714	:	
		DISTRICT COURT
PLAINTIFF	:	
v	:	No. 04-251 JJF
JO ELLEN CHAPEN SHELDON	:	
708 Pebble Beach Drive	:	
Elkton, MD 21921	:	
		JURY TRIAL
DEFENDANT	:	

NOTICE OF SERVICE

I hereby give notice that I caused two (2) true and correct copies of the foregoing Motion for ORDER FOR PROCEDURES FOR FILING SUMMARY JUDGMENT MOTIONS to be served upon the following on the date set forth below, via first class mail, postage prepaid, and/or hand-delivered:

Beth H Christman
CASARINO, CHRISTMAN, & SHALK, P.A.
800 N King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899
Attorney for Defendant

By: Ashley Adams

Ashley Adams
PO Box 7652
Newark, DE 19714
Plaintiff, *pro se*

Dated: July 16, 2007

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

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JO ELLEN CHAPEN SHELDON
708 Pebble Beach Drive
Elkton, MD 21921

DEFENDANT

TO: The United States District Court
For the District of Delaware
The Honorable Judge Joseph J Farnan, Jr
844 N King Street
Lock Box 44
Wilmington, DE 19801

NOTICE OF SERVICE

I hereby give notice that I caused notification by first-class mail and /or hand-delivered for Motion for ORDER FOR PROCEDURES FOR FILING SUMMARY JUDGMENT MOTIONS to be served upon the following on the date set forth below:

Beth H Christman
CASARINO, CHRISTMAN, & SHALK, P.A.
800 N King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899
Attorney for Defendant

By: Ashley Adams
Ashley Adams, Plaintiff, *pro se*
PO Box 7652
Newark, DE 19714

FILING DATE: July 16, 2007